

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
V.) CRIMINAL ACTION NO.: 02-30043-MAP
ANDREY BUYNOVSKIY)
)

EMERGENCY MOTION TO CHANGE PRE-TRIAL CONDITIONS

The defendant, Andrey Buynovskiy, moves this court to revise the current Pre-Trial conditions of release order. There has been a material change in circumstance which warrants Mr. Buynovskiy to be able to travel to the state of Connecticut. As grounds, therefore please see-attached affidavit.

Andrey Buynovskiy
By His Attorney,


Joseph D. Bernard

The Law Offices of Joseph D. Bernard, P.C.
73 State Street, Suite 301
Springfield, MA 01103
413-731-9995
BBO#: 557986

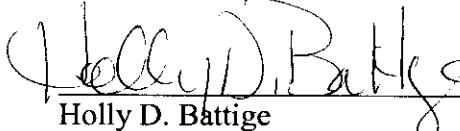
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AFFIDAVIT

1. I, Holly D. Battige, an Associate of Joseph D. Bernard, represent the above-named Defendant, Andrey Buynovskiy.
2. Upon information and belief, there has been a material change in circumstances which warrants a change in certain conditions placed upon Mr. Buynovskiy.
3. Upon information and belief, Mr. Buynovskiy has retained employment with Gilbert Palentino and Son Insulation Inc., located at 68 Springfield Street, Chicopee, MA 01013, a construction company which specializes in insulation installation.
4. Upon information and belief, Mr. Buynovskiy's employment with Gilbert Palentino and Son Insulation, Inc. begins Monday March 8, 2004.
5. Upon information and belief Gilbert Palentino and Son Insulation Inc. provides its services in both Connecticut and Massachusetts.
6. Upon information and belief, Mr. Buynovskiy's job requires that he travel to the state of Connecticut frequently.
7. Upon information and belief, Attorney Bernard spoke with a representative from Pre-Trial Services, from the United States District Court, and Pre-Trial Services assents to this motion.

Signed under the pains and penalties of perjury this 5th day of March 2004.



Holly D. Battige

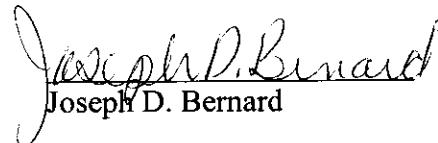
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Certificate of Service

I hereby certify that I served a copy of the foregoing Motion, by Hand delivery, this 5th day of March, 2004 on:

Assistant United States Attorney
Kevin O' Reagan
U.S. Attorney's Office
1550 Main Street, Room 310
Springfield, MA 01103



Joseph D. Bernard



GILBERT & SON INSULATION, INC.

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